

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JEFFREY KRULEWICH and  
NORA KRULEWICH,

Plaintiffs,

V.

COVIDIEN, LP.,

Defendant.

Civil Action No. 1:19-cv-02857-JGK

Application granted.  
SO ORDERED.

New York, NY     /s/ John G. Koeltl  
June 19, 2020     John G. Koeltl, U.S.D.J.

**NOTICE OF JOINT MOTION TO STAY**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law filed simultaneously herewith, the undersigned counsel for Defendant Covidien LP and Plaintiffs Jeffrey Krulewich and Nora Krulewich move before the Honorable John G. Koeltl United States District Judge, of the United States District Court, Southern District of New York, at 500 Pearl Street, New York, NY 10007, on a date and at a time designated by the Court, for an Order staying all proceedings in this action pending decision on a motion currently before the United States Judicial Panel on Multidistrict Litigation (“JPML”) to transfer and coordinate pending federal actions related to the use of Covidien’s hernia mesh products. A stay will conserve judicial and party resources and avoid duplicative litigation. The parties agree that a stay of all proceedings is appropriate.

For the reasons detailed in the accompanying Memorandum of Law in support of this joint motion, Plaintiffs and Defendant respectfully request that the Court grant the motion to stay all proceedings pending a ruling by the JPML on the creation of a Covidien hernia mesh MDL and transfer of this case to that MDL.

Dated: June 19, 2020

Respectfully Submitted,

**DLA PIPER LLP (US)**

/s/ Jessica C. Wilson

Jessica C. Wilson

Katie Insogna

DLA PIPER LLP (US)

33 Arch Street, 26th Floor

Boston, MA 02110-1447

Telephone: (617) 406-6000

Facsimile: (617) 406-6100

jessica.wilson@dlapiper.com

katie.insogna@dlapiper.com

*Attorneys for Defendant Covidien LP*

**MARC J. BERN & PARTNERS, LLP**

s/ Alexandra Colella

Alexandra Colella

MARC J. BERN & PARTNERS, LLP

60 E. 42nd St., Ste 950

New York, NY 10165

Telephone: (212) 702-5000

Acolella@bernllp.com

*Attorney for Plaintiffs Jeffrey Krulewich and  
Nora Krulewich*

**CERTIFICATE OF SERVICE**

I, Jessica C. Wilson, hereby certify that on June 19, 2020, a true and correct copy of the foregoing Notice of Joint Motion to Stay, Memorandum of Law in Support of the Motion, and exhibits to the same, were electronically filed and will be sent to all registered counsel of record by operation of the Court's electronic filing system.

/s/ Jessica C. Wilson

Jessica C. Wilson